1 2 3 4 5 6 7 8 9 10 11 12 13	LAUREN GALLO WHITE, SBN 3090 AMIT Q. GRESSEL, SBN 307663 WILSON SONSINI GOODRICH & ROSATI Professional Corporation One Market Plaza Spear Tower, Suite 3300 San Francisco, CA 94105-1126 Telephone: (415) 947-2000 Facsimile: (415) 947-2099 Email: lwhite@wsgr.com Email: agressel@wsgr.com BRIAN M. WILLEN (Admitted Pro Hac Vice) BENJAMIN D. MARGO, SBN 348644 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 1301 Avenue of the Americas, 40th Floor New York, NY 10019-6022 Telephone: (212) 999-5800 Facsimile: (212) 999-5801 Email: bwillen@wsgr.com Email: bmargo@wsgr.com Attorneys for Defendants YOUTUBE, LLC and SUNDAR PICHAI	JOHN Q. KELLY (Admitted <i>Pro Hac Vice</i>) FERGUSON COHEN LLP 25 Field Point Road Greenwich, CT 06830 Telephone: (203) 661-5222 Facsimile: (203) 661-1197 Email: jqkelly@fercolaw.com JOHN P. COALE (Admitted <i>Pro Hac Vice</i>) 2901 Fessenden Street NW Washington, DC 20008 Telephone: (202) 255-2096 Email: johnpcoale@aol.com Attorneys for Plaintiffs
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15	UNITED STATES DISTRICT COURT	
16	NORTHERN DISTRICT OF CALIFORNIA	
17	OAKLAND DIVISION	
18		
19	DONALD J. TRUMP et al.,) CASE NO.: 4:21-cv-08009-YGR
20	Plaintiffs,	STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE
21	VOLITUDE LL C 44.1) MANAGEMENT CONFERENCE
22	YOUTUBE, LLC et al.,	Hon. Yvonne Gonzalez Rogers
23	Defendants.	
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20	STIPULATION AND [PROPOSED] ORDER	

1	A Joint Case Management Statement on the above-captioned matter is currently due		
2	September 2, 2025, and an Initial Case Management Conference is set for September 8, 2025, at		
3	2:00 p.m. via videoconference.		
4	The parties continue to engage in productive discussions regarding next steps in this case,		
5	with additional discussions anticipated in the near future.		
6	The parties therefore respectfully request that the Initial Case Management Conference be		
7	deferred to November 10, 2025 and the Joint Case Management Statement be due November 3,		
8	2025.		
9		Respectfully submitted,	
10	Dated: August 29, 2025	FERGUSON COHEN, LLP	
11		By: <u>/s/ John Q. Kelly</u> John Q. Kelly	
12		jqkelly@fercolaw.com	
13		Attorney for Plaintiffs DONALD J. TRUMP, KELLY VICTORY,	
14		AUSTEN FLETCHER, AMERICAN CONSERVATIVE UNION, ANDRES	
15 16		BIAGGIANI, MARYSE VERONICA JEAN- LOIUS, NAOMI WOLF, AND FRANK VALENTINE	
17	Dated: August 29, 2025	WILSON SONSINI GOODRICH & ROSATI Professional Corporation	
18		By: <u>/s/ Brian M. Willen</u>	
19		Brian M. Willen bwillen@wsgr.com	
20		Attorneys for Defendants	
21		YOUTUBE, LLC AND SUNDAR PICHAI	
22			
23	<u>SIGNATURE ATTESTATION</u>		
24	I, Brian M. Willen, am the ECF User whose ID and password are being used to file this		
25	document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence		
26	in the filing of this document has been obtained from the other signatory.		
27		/s/ Brian M. Willen	
28			
	STIPULATION AND [PROPOSED] ORDER	-1- Case No.: 4:21-cv-08009-YGR	

1	[PROPOSED] ORDER	
2	Pursuant to stipulation, IT IS SO ORDERED. The Initial Case Management Conference	
3	is reset for November 10, 2025. The parties Joint Case Management Statement is due November	
4	3, 2025.	
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6	Dated:, 2025	
7	Hon. Judge Yvonne Gonzalez Rogers	
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